

A. Michael Covino (AC 4352)
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Attorneys for Defendants
Arthur Kupperman and
PGB International, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

MERRILL LYNCH BUSINESS	:	
FINANCIAL SERVICES, INC.,	:	Civil Action No. 06-Civ-4802(DMC)
	:	
Plaintiff,	:	
	:	
vs.	:	ARTHUR KUPPERMAN'S RESPONSE
	:	TO JP MORGAN CHASE'S LOCAL CIVIL
ARTHUR KUPPERMAN, E. ROSS	:	RULE 56.1 STATEMENT OF MATERIAL
BROWNE, PAULETTE KRELMAN	:	FACTS AND THEIR OWN STATEMENT OF
and PGB INTERNATIONAL, LLC,	:	UNDISPUTED MATERIAL FACTS
	:	
Defendants.	:	

Pursuant to L.Civ.R. 56.1, Defendant Arthur Kupperman ("Kupperman") submits this Response to JP Morgan Chase's Statement of Undisputed Material Facts in opposition to JP Morgan Chase's cross-motion for partial summary judgment:

1. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 1.
2. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 2.
3. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 3.
4. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 4.

5. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 5.
6. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 6.
7. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 7.
8. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 8.
9. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 9.
10. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 10.
11. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 11.
12. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 12.
13. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 13.
14. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 14.
15. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 15.
16. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 16.
17. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 17.
18. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 18.
19. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 19.
20. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 20.

21. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 21.
22. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 22.
23. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 23.
24. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 24.
25. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 25
26. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 26.
27. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 27.
28. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 28.
29. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 29.
30. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 30.
31. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 31.
32. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 32.
33. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 33.
34. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 34.
35. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 35.

36. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 36.
37. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 37.
38. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 38.
39. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 39.
40. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 40.
41. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 41.
42. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 42.
43. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 43.
44. Kupperman asserts his Fifth Amendment Privilege as to statements contained in paragraph 44.


A. Michael Covino

Dated: December 26, 2006
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